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LEONARDO M. RAPADAS  
United States Attorney  
JESSICA F. CRUZ  
Assistant U.S. Attorney  
MIKEL W. SCHWAB  
Assistant U.S. Attorney  
Sirena Plaza, Suite 500  
108 Hernan Cortez Avenue  
Hagåtña, Guam 96910  
TEL: (671) 472-7332  
FAX: (671) 472-7215

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN MARIANA ISLANDS

UNITED STATES OF AMERICA,	)	CRIMINAL CASE NO. 00-00029
	)	
Plaintiff,	)	
	)	
vs.	)	NOTICE OF INTENTION TO TAKE
	)	THIRD PARTY ORAL DEPOSITION
KWOK KWUN LEE,	)	WITH SUBPOENA DUCES TECUM
	)	
Defendant.	)	
_____	)	

TO: Liberty Sayson  
JMS Accounting Service  
Saipan, MP 96950

Please take notice that the United States of America, the plaintiff and judgment creditor herein, will, on August 20, 2008, take third party oral deposition of JMS Accounting Service, in the above referenced case pursuant to Rules 30 and 69(a) of the Federal Rules of Civil Procedure and in aid of collecting its judgment.

Said third party deposition will take place at the offices of the United States Attorney, 3<sup>rd</sup> Floor, Horiguchi Building, Garapan, Saipan, MP at 3:00 p.m. on August 20, 2008 and will continue until completed. Said deposition will be taken before a Certified Court Reporter and will be taken upon oral examination for the purpose of discovery or as evidence or both pursuant to the Federal Rules of Civil Procedure.

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1 Notice is hereby further given that at this deposition, Liberty Sayson, is hereby required  
2 to produce all documents described in the accompanying Schedule A.

3 DATED, this 31<sup>st</sup> day of July, 2008.

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5 LEONARDO M. RAPADAS  
6 United States Attorney  
7 Districts of Guam and the NMI

8 By: /s/ Jessica F. Cruz  
9 JESSICA F. CRUZ  
10 Assistant U.S. Attorney  
11 Jessica.F.Cruz@usdoj.gov  
12 MIKEL W. SCHWAB  
13 Assistant U.S. Attorney  
14 mikel.schwab@usdoj.gov  
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SCHEDULE A TO NOTICE OF INTENT TO TAKE  
THIRD PARTY ORAL DEPOSITION WITH SUBPOENA DUCES TECUM

1. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions of Kwon Kee of Saipan, Inc., or any sole proprietorship, partnership or corporation in which Kwok Kwun Lee, his wife, or any other members of his household owns an interest (collectively referred herein as "Company").
2. Current bank statements for the past twelve (12) months from all domestic and foreign banks or other financial institutions for accounts in Kwok Kwun Lee's name or for which Kwok Kwun Lee, his wife, or any other members of his household or Company is a signatory.
3. All trust agreements in Kwok Kwun Lee, his wife, or any other members of his household is named settlor, trustee, or beneficiary.
4. All deeds, leases, contracts, and other documents evidencing encumbrances of any kind on real property with Kwok Kwun Lee, his wife, or any other members of his household or Company.
5. A listing of all stock, bonds, or other securities of any class Kwok Kwun Lee, his wife, or any other members of his household or Company owns, including options to purchase any securities and the actual instruments if in your possession.
6. Current brokerage statements for the past twelve (12) months from any stock brokerage firm or similar entity where Kwok Kwun Lee, his wife, or any other members of his household or Company had an account of any kind.
7. Title to any motor vehicle jointly owned by Kwok Kwun Lee, his wife, or any other members of his household or Company.
8. All promissory notes held by you, and all other documents evidencing any money owed to Kwok Kwun Lee, his wife, or any other members of his household or Company, either now or in the future.
9. All deeds, titles, bills of sale, or other documents prepared in connection with any transfer of real or personal property made by Kwok Kwun Lee, his wife, or any other members of his household or Company, either by gift, sale, or otherwise.
10. All documents evidencing any interest Kwok Kwun Lee, his wife, or any other members of his household or Company has in any pension plan, retirement fund, or profit sharing plan.
11. All financial records, including balance sheets, accounts receivables records, records of debts and liabilities, and all assets of Kwok Kwun Lee, his wife, or any other members of his household or Company.
12. A copy of all tax filings signed or submitted by Kwok Kwun Lee, his wife, or any other members of his household or Company, submitted for the years 2003 to date.
13. Copies of all financial or tax filing records for Kwok Kwun Lee, his wife, or any other members of his household or Company for tax year 2008.
14. A specified list of all sources of income for Kwok Kwun Lee, his wife, or any other members of his household or Company each year starting with January 2003 to date.
15. Any other sources of income for Kwok Kwun Lee, his wife, or any other members of his household or Company not previously mentioned.